

TODD KIM, Assistant Attorney General  
 SETH M. BARSKY, Section Chief  
 MEREDITH L. FLAX, Assistant Section Chief  
 RICKEY D. TURNER, JR. CO Bar No.38353  
 Senior Attorney  
 U.S. Department of Justice  
 Environment & Natural Resources Division  
 Wildlife & Marine Resources Section  
 999 18<sup>TH</sup> Street, South Terrace, Suite 370  
 Tel: (303) 844-1373  
 Email: rickey.turner@usdoj.gov

*Attorneys for Federal Defendants*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF ARIZONA**

Center for Biological Diversity,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:22-cv-90-TUC-JCH
	)	
U.S. Fish and Wildlife Service; and	)	<b>UNOPPOSED MOTION FOR</b>
Debra Haaland, in her official capacity	)	<b>EXTENSION</b>
as Secretary of the U.S. Department of	)	
the Interior,	)	
	)	
Defendants.	)	
_____	)	

Defendants, the U.S. Fish & Wildlife Service, *et al.* (collectively, “FWS”), respectfully request an extension of time, until August 4, 2022, to respond to Plaintiff’s complaint. In support of this request, Defendants state the following:

1. The deadline to respond to Plaintiff’s complaint is July 5, 2022.
2. The Parties are in settlement discussions and require additional time.
3. To allow additional time for settlement discussion, Defendants request an extension of time, until August 4, 2022, to respond to Plaintiff’s complaint.

1 4. Plaintiff does not oppose this request.

2 Respectfully submitted on this 1<sup>st</sup> day of July, 2022.

3  
4 TODD KIM, Assistant Attorney General  
5 SETH M. BARSKY, Section Chief  
6 MEREDITH L. FLAX, Assistant Section Chief

7 /s/ Rickey D. Turner, Jr.

8 RICKEY D. TURNER, JR.

9 CO Bar No. 38353

10 Senior Attorney

11 Wildlife and Marine Resources Section

12 999 18th Street, South Terrace, Suite 370

13 Denver, Colorado 80202

14 Phone: (303) 844-1373

15 rickey.turner@usdoj.gov

16 *Attorneys for Federal Defendants*